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Hon. Lewis A. Kaplan United States District Court 500 Pearl Street New York, NY 10007

Hon. Ronald L. Ellis United States Distri 500 Pearl SHUSDS SDNY New York ECTRONICALLY FILED

LB Arts SPRL v. Neuhoff, 08 CV 3726 (LAK)(RDOC #: Re:

Dear Judge Kaplan and Magistrate Judge Ellis:

We represent defendants other than Neuhoff-Edelman Gallery, LLC for the limited purposes of appearing at the settlement conference before Mag. J. Ellis on July 3 and seeking a second extension of time to respond to the complaint

We applied by letter dated May 2 to extend the time of Heidi Neuhoff, Heidi Neuhoff International Fine Arts, Inc. and Heidi Neuhoff Gallery, Inc. to respond to the complaint to June 11 and to set a settlement conference in the hope of holding the conference and settling the action before a response to the complaint fell due. That would save our clients the substantial expense of retaining a lawyer to answer or move against the complaint in this RICO action, reducing the money available for settlement. Judge Kaplan granted our request. A response to the complaint is due June 11; our Rule 26 conference is set for June 13. A few days after Judge Kaplan granted our request, Mag. J. Ellis set the settlement conference for July 3.

We ask that the June 11 date for responding to the complaint be adjourned to July 17, with the Rule 26 conference to follow at any date convenient to the court. This will permit the settlement conference to occur before the answer, and will save the parties substantial time and legal fees.

I make this request instead of my partner Larry Steckman because he is in Africa this week on business.

Respectfully,

Dennis M. Rothman

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LESTER SCHWAB KATZ & DWYER, LLP

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cc:

Joseph T. Jackson, III, Esq. Ted G. Semaya, Esq. Lawrence A. Steckman, Esq.

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